

CONTINUATION OF CRIMINAL COMPLAINT

I, Joshua Filz, being duly sworn, state as follows:

Background and Proposed Charges

1. I am a Special Agent with Homeland Security Investigations (HSI) and have been so employed since April 2021. Before joining HSI, I worked for the Michigan State Police (MSP) as a Detective Trooper (D/Tpr.) on the Upper Peninsula Substance Enforcement Team (UPSET) from March 2016 until April 2021. I graduated from the MSP Training Academy in 2012 and was appointed to the Calumet Post, where I served as a trooper for approximately six months, before transferring to the Wakefield Post, where I served as a trooper for approximately three years. In 2016, I was assigned to UPSET, and received Special Deputation as a Task Force Office (TFO) from the Federal Bureau of Investigations (FBI), serving as a member of the Upper Peninsula Safe Trails Task Force (UPSTTF). In 2018, I attended HSI TFO training, and upon completion was deputized as an HSI TFO for the Border Enforcement Security Team (BEST). As an UPSET detective, my primary law enforcement mission was to investigate and interdict drug trafficking impacting the Upper Peninsula of Michigan. As a Special Agent, I have the authority to seek and execute federal process, to include search warrants and criminal complaints, under Titles 18 and 21 of the United States Code.

2. I have attended numerous trainings with a focus on investigating drug crimes from various agencies and training centers, including the Federal Law Enforcement Training Center, MSP, U.S. Drug Enforcement Administration, HSI, Northeast Counter Drug Training Center, North Central HIDTA, US Attorney's Office – Western District of Michigan, and National White-Collar Crime Center. Through my training and experience, I have become familiar with the identification of illegal controlled substances, including methamphetamine, and I am familiar with illegal drug terminology, packaging, and trafficking methods. I have taken part in hundreds of narcotics investigations and have drafted numerous search warrants related to narcotics trafficking, manufacturing, and use.

3. The information set forth in this complaint is based upon my personal knowledge, my training and experience, and participation in the investigation described below, as well as information provided to me by witnesses, and other law enforcement officers. The information outlined below is provided for the limited purpose of establishing probable cause to support issuance of a criminal complaint and arrest warrant, and it does not contain all of the details or all of the facts of which I am aware relating to this investigation.

4. I submit that the facts set forth in this continuation establish probable cause to believe that, from on or about June 20 to June 23, 2023, Curtis Alan ST ANDRE mailed a parcel containing a distribution quantity of methamphetamine

from Arizona, to an address in Marquette County, in the Western District of Michigan – Northern Division, and subsequently knowingly and intentionally attempted to possess with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(C). Accordingly, I respectfully request that this Court authorize a criminal complaint and issue a warrant for ST ANDRE's arrest.

Facts Establishing Probable Cause

5. Through interviews, review of business records, and various methods of electronic messaging, ST ANDRE has been identified as someone who has been trafficking controlled substances, including 10-to-15-pound quantities of methamphetamine, from Arizona to individuals in Marquette County, since 2021. Since 2021, several of the individuals who were supplied by ST ANDRE have been arrested for state drug charges in Michigan.

6. In spring of 2023, while utilizing an undercover Facebook Account, D/Tpr. John Edwards, assigned to MSP UPSET, became "friends" with Facebook Account "Curtis St Andre", which displays a profile picture of an individual that D/Tpr. Edwards can identify as ST ANDRE as D/Tpr. Edwards subsequently met him. ST ANDRE advised that he was going to be flying to Michigan, and was going to send himself a package, which was going to contain something that he did not want to take on the airplane. ST ANDRE informed D/Tpr. Edwards that ST ANDRE wanted to give D/Tpr. Edwards some of what ST ANDRE was shipping. In further detail, the following excerpts of the Facebook Messenger conversation document the conversation between D/Tpr. Edwards and ST ANDRE and, based on my training and experience, show ST ANDRE's intent to distribute methamphetamine to Michigan. Specifically, On June 7, 2023, ST ANDRE wrote: "Please be careful with that shit up there. I know you need it but it's not worth losing you. You don't know what's in it. That's the scary part. Just be careful for me. Ok. I know what I have and it will rick your world." ST ANDRE then corrected his previous message and advised: "It will rock your world. 🤪" ST ANDRE then wrote: "You could be awake for a week or so. Jk 🤪🤪or not.." Based on my training and experience, I have learned phrases and terminology referencing various drugs. Based on my training and experience, when ST ANDRE said "I know what I have and it will rock your world. You could be awake for a week or so," I believe that ST ANDRE is referring to methamphetamine, which is a stimulant and can cause people to stay awake for long periods of time.

7. On June 8, 2023, D/Tpr. Edwards sent ST ANDRE the following message: "Oh yay! I'm glad you're not disappointed in me. If you're flying how do you get by security with the stuff they search me every time so thoroughly lol it's crazy like stop profiling me for real." ST ANDRE replied: "I never carry it with me. Let's just leave it at that. Ok."

8. On June 11, 2023, ST ANDRE sent: "I am glad to hear you are feeling a

little better. When a person experiences that bad stuff, it always causes nasty headaches. I remember those experiences all to well. It has been many yrs since that happened. Never out West has that happened to me. 😂. I am happy to share a good time with you. Especially I know how good mine is. 😂😂. You will enjoy this stuff. You are not going to believe the difference. You will be spoiled. 😂”. Based on my training and experience and my investigation, I believe that ST ANDRE is explaining that he has access to methamphetamine of very good quality and is going to share his methamphetamine with D/Tpr. Edwards’ undercover persona.

9. On June 12, 2023, ST ANDRE sent D/Tpr. Edwards: “My dear Lady I don't have stepped on stuff. I know where mine comes from and I have never ever stepped on any of my stuff. Those people are GREEDY, SELFISH SOBS. I hope you don't try anymore. Please keep this between us. Ok. We don't need anyone asking where it came from. If this were to get around up there, they might wonder where it is coming from if someone got popped with it. They don't see shit like this up there. 😂” and “Hang in there Lady, I will be there soon. I don't know how that is going to help, but at least you will have a good time with the stuff. 😂😂”. Based on my training and experience, I have learned that the phrase “stepped on stuff” means cutting, or diluting a controlled substance, which is a common practice used by drug dealers to increase profits. ST ANDRE also sent: “In fact Sweetie you may be the only person other than” (a named individual) “who knows I am coming up there. Lol. My circle is small also. 😂”

10. On June 14, 2023, ST ANDRE sent the following to D/Tpr. Edwards: “I hope you had a good day. I am packing some of my belongings to send up there. Stuff I don't want to take on the plane. 😂😂. I will probably be there before the package arrives. 😂My riding gear and helmet, pair of boots. Whatever else I can't fit in my suitcase. 😂.” Based on my training and experience, combined with the context of the conversation and my investigation, I believe that ST ANDRE is referring to the methamphetamine that he is planning to share with D/Tpr. Edwards’ undercover persona, as the “Stuff I don't want to take on the plane”, which he is planning to “send up there” in the “package”.

11. On June 15, 2023, a United States Postal Service (USPS) parcel bearing USPS tracking number 9534 6114 5367 3166 3095 25 was sent from Coolidge, Arizona. The “Sender” information was listed as: Curtis ST ANDRE, 1425 W. Hess Ave, Coolidge, AZ 85128, and the parcel was addressed to a known address in Ishpeming, MI 49849. On June 20, 2023, the parcel arrived at the Ishpeming, Michigan Post Office and was intercepted by the United States Postal Inspection Service (USPIS).

12. On June 22, 2023, Inspector Derik Thieme, assigned to USPIS - Green Bay, Wisconsin obtained a search warrant from the United States District Court for the Eastern District of Wisconsin, authorizing the search of the parcel. The parcel was found to contain approximately 44.3 grams (packaged weight) of a white

crystalline substance consistent with the appearance of methamphetamine, which also field tested positive as methamphetamine.

13. On June 23, 2023, detectives assigned to UPSET conducted a knock-and-talk at the address that the parcel was addressed to. ST ANDRE was at the residence and participated in a consensual interview. D/Tpr. Westcott documented a summary of ST ANDRE's statements in MSP UPSET Incident Report: UPT-164-23. In summary, ST ANDRE admitted that he purchased the 1.5 ounces of methamphetamine in Arizona and sent it to himself, using his friend's address. ST ANDRE claimed that the methamphetamine was for personal use and denied selling methamphetamine. However, ST ANDRE admitted to previously bringing one to two ounces of methamphetamine to Michigan, and he admitted to giving 'a line' to his friends, on occasions.

14. ST ANDRE gave consent to search his phone. On the phone, an investigator saw that the phone was associated with the Facebook Account "Curtis St Andre," and included some of the messages that D/Tpr. Edwards' undercover account received from ST ANDRE.

15. Based on my training and experience, 44 grams of methamphetamine (approximately 1.5 ounces) is a quantity indicative of possession with intent to distribute methamphetamine. Furthermore, in my training and experience, the seizure of 44 grams of methamphetamine from the parcel shipped by ST ANDRE, ST ANDRE's admissions of shipping the methamphetamine and previously giving away lines of methamphetamine, combined with the Facebook Messenger conversations where ST ANDRE discussed bringing methamphetamine to Michigan for D/Tpr. Edwards' undercover persona shows ST ANDRE intended to distribute the methamphetamine.

Conclusion

16. I respectfully submit that the facts set forth above establish probable cause to believe that from on or about June 20 through June 23, 2023, in the Western District of Michigan, Curtis Alan ST ANDRE knowingly and intentionally attempted to possess with intent to distribute methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 846, 841(a)(1), 841 (b)(1)(C).